

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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DR. HUGH DUCKWORTH,

Plaintiff

v.

R3 EDUCATION INC., f/k/a  
EIC HOLDING, INC., f/k/a  
EIC ACQUISITION CORPORATION,  
STEVEN C. RODGER, and  
TERRY J. MOYA,

Defendants

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Case No. 1:17-cv-11169-FDS

**PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff Dr. Hugh Duckworth hereby opposes Defendants' R3 Education Inc. (f/k/a EIC Holding, Inc., f/k/a EIC Acquisition Corporation), Steven C. Rodger, and Terry J. Moya Motion to Dismiss.

Defendants' Motion relies exclusively on a document it claims is a release. As Plaintiff's Complaint makes clear, he disputes the validity of the document at issue. A memorandum of law in support of his opposition is attached hereto.

Dated:

Respectfully Submitted,

DR. HUGH DUCKWORTH,  
By his attorneys,  
*/s/ Simon B. Mann*

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